

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2018, covering calendar year 2017.

1. Date filed: February 26, 2018
2. Names of companies covered by this certification: See Attachment B (collectively, the "Company")
3. Form 499 Filer ID: See Attachment B
4. Name of signatory: Michael Shultz
5. Title of signatory: Vice President Legislative and Regulatory for Consolidated Communications Holdings, Inc., the ultimate parent company of FairPoint Communications
6. Certification:

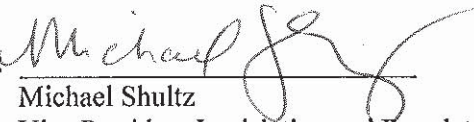
I, Michael Shultz, certify that I am an officer of the Company and acting as an agent of the Company, and that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement (see Attachment A) explaining how the Company's procedures ensure that the Company is in compliance with the CPNI requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The Company has not taken actions (*i.e.*, instituted any proceeding or filed any petition at a state commission, a court, or the Commission) against data brokers in the past year.

The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI. The Company had an employee make a mistake which disclosed a customer's online account information to another customer. There was also a situation that did not follow proper CPNI procedures when authenticating an account. See Attachment C.

The Company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The Company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed: 
Michael Shultz
Vice President Legislative and Regulatory
770 Elm ST
Manchester, NH 03101

Attachment A:
Summary of Procedures
Related to the Protection of CPNI

Consolidated Communications Holdings, Inc. is the ultimate parent company of the FairPoint Communications (FairPoint) companies listed in Attachment B, and has instituted numerous procedures to ensure that the Company complies with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.* For example:

Customer Control of Company's use of CPNI. FairPoint does not use CPNI for any purpose other than those specified in Section 64.2005 of the Commission's rules without customer consent. Fairpoint's systems are designed to clearly identify whether and to what extent a customer has consented to the use or disclosure of CPNI, consistent with Section 64.2009(a) of the Commission's rules. Any customer may change his or her CPNI preferences at any time by contacting customer service.

Customer Notice. FairPoint obtains a customer's "opt out" consent only after providing the notice required by Section 64.2008 of the Commission's rules. FairPoint waits at least 33 days after such notice is provided before deeming a customer's consent to be effective. FairPoint renews the required notice at least once every two years. FairPoint's legal team reviews all such notices, and all requests for customer consent to the use or disclosure of CPNI, to ensure compliance with Section 64.2008. FairPoint also reviews all proposed uses of CPNI to determine whether additional customer notice and consent is required.

CPNI Access by FairPoint Personnel. FairPoint ensures that customers that have indicated a preference to "opt out" are not included in any list to be used in outbound sales and marketing campaigns (except as permitted by Section 64.2005 of the Commission's rules). FairPoint conducts a supervisory review of all internal requests to use CPNI in such campaigns, pursuant to Section 64.2009(d) of the Commission's rules. FairPoint also conducts a legal review of all contracts and other arrangements involving the potential disclosure of CPNI to third parties. FairPoint maintains records of all sales and marketing campaigns making use of CPNI, and instances (if any) when CPNI is disclosed or provided to third parties, consistent with Section 64.2009(c) of the Commission's rules.

CPNI Access by "Customers." Consistent with Section 64.2010 of the Commission's rules, FairPoint authenticates a customer's identity before providing access to that customer's call detail records. FairPoint will disclose call detail records in response to a customer-initiated telephone contact only: (i) if the customer first provides a password that is not prompted by FairPoint's request for readily available biographical information or account information; (ii) by sending the records to the customer's address of record; (iii) by placing a separate call to the customer's telephone number of record; or (iv) if the customer is able to provide call detail information without FairPoint's assistance (provided that FairPoint will then discuss only the call detail information provided by the customer). FairPoint will disclose CPNI in response to a customer's electronic request only by sending the requested information to the customer's address of record. FairPoint will disclose CPNI in response to a customer's in-person request only after the customer first presents a valid photo ID matching the customer's account information. Although FairPoint normally is able to authenticate all requests from "customers," FairPoint's procedures call for a supervisory review of requests from any "customer" who cannot

be immediately authenticated. FairPoint's systems for all of its companies generate a notification to a customer whenever a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed.

CPNI Access by Third Parties. FairPoint conducts a legal or regulatory review of all requests for access to CPNI from non-FairPoint personnel (other than "customers") before granting such requests. In general, FairPoint does not share CPNI with third parties for marketing purposes or any other purpose that would require affirmative customer "opt in" consent. FairPoint employs a trusted third party to review all warrants, court orders, subpoenas, and surveillance requests from law enforcement personnel.

Notification of Improper Access to CPNI. FairPoint has not experienced any CPNI-related security breaches in the past year. If such breaches were to occur, FairPoint would notify law enforcement, as well as customers where appropriate, pursuant to Section 64.2011 of the Commission's rules. Consistent with Section 64.2009(f) of the Commission's rules, FairPoint would also notify customers of any instances in which "opt out" mechanisms did not work properly to such a degree that customers' inability to "opt out" was more than an anomaly.

Self-Assessment and Training. Consistent with Section 64.2009(b) of the Commission's rules, FairPoint reviews, on an annual basis, the effectiveness of its internal procedures with respect to CPNI, and updates its training materials periodically to reflect changes in the Commission's rules and industry best practices. FairPoint requires all employees to receive CPNI training at least annually. Additional in-depth CPNI training is provided for employees in positions likely to be dealing with CPNI on a regular basis. All employees are instructed to report any concerns about violations of the company's CPNI policy to their supervisor. All employees are further instructed that violations of the CPNI policy, and failure to report suspected CPNI violations, can result in disciplinary action up to and including termination.

Attachment B:
List of FairPoint Companies

B.E. Mobile Communications, Inc.	814763	FairPoint Vermont, Inc.	809624
Bentleyville Communications Corporation	804795	The Germantown Independent Telephone Company	808407
Berkshire Cable Corp.	824726	Germantown Long Distance Company	816718
Berkshire Telephone Corporation	802959	GTC, Inc.	801855
Big Sandy Telecom, Inc.	801105	Maine Telephone Company	808391
Bluestem Telephone Company	811597	Marianna and Scenery Hill Telephone Company	801375
Chautauqua & Erie Communications, Inc.	803052	Marianna Tel, Inc.	816148
Chautauqua and Erie Telephone Corporation	803055	Northland Telephone Company of Maine, Inc.	809625
China Telephone Company	808137	Northern New England Telephone Operations LLC	827121
Chouteau Telephone Company	803622	Odin Telephone Exchange, Inc.	808311
Columbine Telecom Company	804097	Orwell Communications, Inc.	820810
The Columbus Grove Telephone Company	809796	The Orwell Telephone Company	808314
Comerco, Inc.	822806	Peoples Mutual Long Distance Company	821666
Community Service Telephone Co.	808158	Peoples Mutual Telephone Company	802170
C-R Long Distance, Inc.	801346	Quality One Technologies, Inc.	820151
C-R Telephone Company	801345	Sidney Telephone Company	808390
El Paso Long Distance Company	808573	ST Long Distance, Inc.	804428
The El Paso Telephone Company	808572	St. Joe Communications, Inc.	808392
Ellensburg Telephone Company	801162	Standish Telephone Company	808389
Elitel Long Distance Corp.	819056	Sunflower Telephone Company, Inc.	804429
Enhanced Communications of Northern New England Inc.	827123	Taconic TelCom Corp.	808681
ExOp of Missouri, Inc.	821082	Taconic Telephone Corp.	808680
FairPoint Business Services LLC	829941	Telephone Operating Company of Vermont LLC	827122
FairPoint Carrier Services, Inc.	817480	UI Long Distance, Inc.	822930
FairPoint Communications Missouri, Inc.	826139	YCOM Networks, Inc.	803502

ATTACHMENT C

A Northern New England Telephone Operations employee made an error when creating online account access, which inadvertently granted account access to a different customer's account. The Customer Service Representative had been on the phone helping a customer (Customer A) with their internet account. After the call completed, the next customer (Customer B) asked for help setting up online access to their account in order to pay their bill and manage their account via the FairPoint customer portal. The Customer Service Representative mistakenly used the account number of Customer A when setting up the online access for Customer B. Customer B immediately called and reported the error to FairPoint and online access to Customer A's account was disabled and access to Customer B's account was set up. The Company notified Customer A of the situation and provided her with the account information that was seen by Customer B.

In a different situation, a Northern New England Telephone Operations employee authenticated an account using improper means. The billing account number was used to authenticate the account and an unauthorized individual was able to call in to change the customer's phone number. To ensure this did not happen again, the proper CPNI process, utilizing the customer password and security questions were reviewed with the employee. The customer's account has been updated with a new password and new security questions.